

LAW OFFICES OF  
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May 26, 2021

VIA ECF

**MEMO ENDORSED**

Hon. Katherine Polk Failla  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *United States of America v. Christian Baez, 19 Cr. 690 (KPF)*

Dear Judge Failla,

I am counsel to defendant Christian Baez in the above-captioned case. I write to respectfully request a modification of my client's pretrial release status. Mr. Baez is seeking to make a one-day trip outside of his specified judicial districts to attend a family friend's baby shower on June 5, 2021. The baby shower will occur from 6:30pm to 10:30pm at River View Banquet Center, 56 River Road, Berkeley Heights, NJ 07922. The travel time from Mr. Baez's home to the location is approximately an hour and a half to two hours depending on traffic. Accordingly, I respectfully request Mr. Baez be permitted to travel to the desired location in the District of New Jersey from 4:30pm on June 5, 2021 to 12:30am on June 6, 2021. Pretrial and the Government do not object to this request.

Thank you for your attention to this matter.

Very truly yours,



Daniel A. McGuinness

Cc: All Counsel (via ECF)

Application GRANTED.

SO ORDERED.

Dated: May 27, 2021  
New York, New York

  
HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE